

GUIDELINES FOR STANDARDS OF CONDUCT
OF TRANSITION PERSONNEL

Policy

Each participant in the transition organization should recognize the importance of maintaining public confidence in the integrity of the new administration. While it is not reasonable to expect that the numerous individuals who will be assisting the transition should terminate their current employment and financial relationships for the relatively short transition period, it is essential that participants avoid any conflict of interest or other unethical conduct in their transition activities. This is a responsibility that must be shouldered by each participant so that his activities or involvement will not reflect unfavorably on him or on the President-elect.

Standards of Conduct

1. A transition participant shall not become involved in any matter in which he is motivated by, or gives the appearance of being motivated by, the desire for private gain for himself or other persons, particularly those with whom he has family, business, or financial ties. Such matters would include adjudicatory proceedings, rulemakings, procurements, contracts, grants, loans or loan guarantees, or policy determinations (including personnel determinations).

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2. A transition participant shall not use any inside or confidential information obtained in connection with his transition service for personal gain, either directly or by counsel, recommendation or suggestion to others.

3. A transition participant shall refrain from disclosing any confidential information received in connection with transition service.

4. A transition participant shall not use his position in any way to persuade or coerce, or give the appearance of persuading or coercing, another person to provide any financial benefit to him or to any other person or entity.

5. A transition participant shall not, in connection with his transition activities, receive or solicit from persons in, or having business with, any agency or department he is dealing with on transition matters, anything of value as a gift, gratuity, loan or favor for himself, his clients or persons with whom he has family, business or financial ties. (This does not preclude the acceptance of: (1) food or refreshments available in the course of a meal or other social occasion where the transition participant is properly in attendance; or (2) nominal gifts worth less than \$10.)

6. A transition participant shall not, in connection with his transaction activities, formally discuss any

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transition matter with any agency or department unless specifically authorized to undertake such activity by the Director of Transition.

7. If an individual has any serious questions that his participation in the transition, or in any particular matter or facet of the transition, might raise questions of conflicts of interest, or unethical conduct or result in adverse publicity for the new administration, he should refrain from such participation unless and until the matter has been discussed with the General Counsel and his clearance has been obtained.